



TULANE LAW SCHOOL

TULANE ENVIRONMENTAL LAW CLINIC

December 14, 2020

By email to: McQueen.ken@epa.gov and Gray.david@epa.gov and U.S. Mail
Mr. Ken McQueen, Regional Administrator
Mr. David Gray, Deputy Regional Administrator
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Mail Code ORA
Dallas, TX 75270-210

Re: Follow-up to September 4, 2020, Letter Objecting to Discontinuation
of EPA Chloroprene Community Monitoring in Reserve, Louisiana

Dear Mr. McQueen and Mr. Gray,

On behalf of the Concerned Citizens of St. John the Baptist Parish, thank you for your September 17, 2020, response to our September 4, 2020, letter objecting to the discontinuation of chloroprene community monitoring in favor of continuous air monitoring with SPods in St. John the Baptist Parish. We appreciate your stated commitment to working with this community to fulfill your mission of protecting human health and the environment. We would like to follow up on several points that are critical to protecting human health in this community.

We understand that the purpose of the Sensit SPod monitoring program is, as you noted, to “help EPA understand the magnitude and frequency of occasional, but recurring, elevated chloroprene measurements or ‘spikes’ . . .” We further understand that **EPA can influence how often the SPods detect chloroprene spikes by altering the trigger levels of these monitors.** From your response to our letter, it appears that EPA cannot guarantee that the SPod monitors will reliably detect chloroprene spikes of a given magnitude, since the monitor is triggered by total volatile organic compounds (tVOCs) and not chloroprene specifically.

From a human health perspective, it is essential that EPA be transparent about the limitations of this monitoring system and provide the St. John community with all the relevant methodological information about this project. The specific methods employed by EPA will influence the magnitude and frequency of the chloroprene spikes detected by the SPods. Therefore, we request the following essential pieces of information, on behalf of the Concerned Citizens of St. John the Baptist Parish:

1. The tVOC concentration (i.e. numerical value) required to trigger canister collection of each monitor. We understand that trigger level of the Sensit SPod monitor can be set between 10 ppb (0.01 ppm) and 2 ppm, a range that spans two

Tulane Environmental Law Clinic

6329 Freret St., Ste. 130, New Orleans, LA 70118-6248 *tel* 504.865.5789 *fax* 504.862.8721
<https://law.tulane.edu/clinics/environmental>

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orders of magnitude. Please provide both the current and all previous trigger levels for each monitor, as well as the date of change(s) of the corresponding trigger levels. Please indicate whether there are any anticipated changes to the trigger level of each monitor during the remainder of this monitoring project. This information is essential to the community's interest and is fundamental to any photoionization detector (PID)-based monitoring project. Region 6 EPA staff committed to providing Dr. Kimberly Terrell (Tulane Environmental Law Clinic) with this information at the August 25, 2020, meeting of the Region 6 Environmental Justice Stakeholders. However, as of today, Dr. Terrell has not received this information.

2. The energy output of the lamp used for each SPod monitor. In other words, is EPA using the standard 10.6 eV lamp described in the SPod Sensit user manual, or is EPA using an alternative lamp (e.g. 8.4 eV, 9.6 eV, 10.0 eV, 10.2 eV, 10.6 eV, 11.7 eV)? If so, which lamp? This information will allow us to inform St. John residents of which specific VOCs can be detected by the SPod monitors in their community.
3. For each monitoring site, the expected proportion of chloroprene as a % of tVOCs, based on the data collected by EPA Region 6 during the initial phase of this project. Specifically, please provide the mean and overall range of chloroprene as a % of tVOCs for each monitoring site.

The above pieces of information are essential to understanding the results of EPA's SPod monitoring project in St. John the Baptist Parish and to informing public health efforts in this community. If necessary, please forward our request to the EPA personnel who would have this information for response. Thank you.

Sincerely,

/s/ Lisa Jordan

Lisa W. Jordan, Director
Tulane Environmental Law Clinic
Phone (Direct): 504-314-2481
Email: lwjordan@tulane.edu
Counsel for Concerned Citizens of St. John

/s/ Kimberly Terrell

Kimberly Terrell, PhD, Staff Scientist
Tulane Environmental Law Clinic
Phone (Direct): 504-865-5787
Email: kterrell1@tulane.edu

cc (by email): Jeff McAtee

Director, Office of External Affairs – Region 6